

UNITED STATES DISTRICT COURT - DISTRICT OF NEW HAMPSHIRE  
ANDRE BISASOR, Plaintiff,

v.

CRAIG S. DONAIS; RUSSELL F. HILLIARD; DONAIS LAW OFFICES, PLLC;  
UPTON & HATFIELD, LLP; and MARY K. DONAIS, Defendants.

Case No.1:23-cv-00374-JL

**PLAINTIFF'S EMERGENCY MOTION FOR MISCELLANEOUS RELIEF REGARDING  
CERTAIN PROCEDURAL MATTERS OF THE HEARING ON 5-24-24  
INCLUDING BUT NOT LIMITED TO**

**PLAINTIFF'S REQUEST TO INCLUDE THE PLAINTIFF'S RELATED MOTION TO  
STRIKE, MOTION FOR DISCOVERY AND MOTION FOR SANCTIONS IN THE  
HEARING ON 5-24-24**

**AND**

**PLAINTIFF'S REQUEST TO HOLD ANY DECISION ON THE MOTION TO AMEND  
THE COMPLAINT UNTIL THE PLAINTIFF'S MOTION FOR DISCOVERY RELATING  
TO THE MOTION TO AMEND COMPLAINT IS FULLY RIPE AFTER THE 6-3-24  
DEADLINE OR IS OTHERWISE RESOLVED**

1. I the plaintiff hereby submits this emergency motion for miscellaneous relief regarding certain procedural matters of the hearing today, including but not limited to the following:
  - a. that the court includes discussion of the plaintiff's motion to strike, motion for discovery and motion for sanctions in the hearing today, on 5-24-24. In particular, I ask for the hearing today to include discussion or questions regarding the plaintiff's motion for discovery and the plaintiff's motion for sanctions, that were filed on 5-9-24, and that were objected to by the defendants on 5-13-24 and/or thereafter, up until yesterday, and which motions are included/attached in the plaintiff's replies (both original and corrected) to the defendants' objections to the motion to amend complaint.
  - b. that the court holds (or stays) any decision on the motion to amend the complaint until the plaintiff's motion for discovery relating to the motion to amend the complaint, in particular, is fully ripe after the court's 6-3-24 deadline to reply to the defendants' objections, or is otherwise resolved thereafter. The court granted the plaintiff until 6-3-24 to file the replies to the defendants' objections to discovery on the motion to amend the complaint. Logically, the court cannot or should not decide the motion to amend the complaint until the motion for discovery on the motion to amend the complaint is fully ripe, as the motion for discovery must or should

be resolved before, or at least at the same time as, the motion to amend the complaint. NB: I have raised the issue of discovery regarding the motion to amend the complaint in several places including in the motion to amend the complaint itself and in the replies to the defendants' objections thereto and elsewhere, as well as in the motion for discovery as well as in the motion for sanctions.

- c. that adequate time be allowed for me to present at the hearing today (as was discussed and agreed to at the 4-23-24 hearing).
- d. that I be allowed to present exhibits by email to the court with defendants copied (except for a sealed document) during the hearing today as needed to supplement my presentation to the court. NB: If it was an in-person hearing, I believe I would be allowed to submit exhibits by hand to the court. I should not be prevented from doing something similar because there is an accommodation of a zoom hearing.
- e. that time be allowed to address these issues as well as certain other important procedural issues that are ancillary to or that precede or should precede the motion to amend the complaint.

2. I ask that these matters be addressed at the hearing today.

3. I sought concurrence from the defendants on this motion but have not received concurrence.

4. WHEREFORE, I respectfully request that this Court grants the relief requested or grant any other relief the Court deems proper

Respectfully submitted,  
/s/Andre Bisasor  
Plaintiff Andre Bisasor

May 24, 2024

**CERTIFICATE OF SERVICE**

This filing is served to all parties of record via the e-filing system.

/s/Andre Bisasor  
Andre Bisasor